

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Petition of Verizon New England Inc. for Arbitration
of an Amendment to Interconnection Agreements with
Competitive Local Exchange Carriers and Commercial
Mobile Radio Service Providers in Massachusetts
Pursuant to Section 252 of the Communications Act
of 1934, as Amended, and the *Triennial Review Order*

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D.T.E. 04-33

VERIZON MASSACHUSETTS'
MOTION TO AMEND THE PROCEDURAL SCHEDULE

Verizon Massachusetts (“Verizon MA”) requests that the Department amend the schedule established at the January 5th procedural conference by granting a two-week extension for filing its testimony on rate issues. Verizon MA also requests that all other scheduled dates relating to those issues be extended by the same two-week interval, as shown on Exhibit I to this Motion. In support of this request, Verizon MA states as follows:

In its *Procedural Order* issued December 15, 2004, the Department required Verizon MA “not only to demonstrate that the charges for routine modifications are just and reasonable, but also that there is no double recovery of costs in any charges it seeks to impose for routine modifications.” *Procedural Order*, at 31. The work effort involved to develop and analyze the data necessary to complete the requisite cost studies is a time-consuming, detailed process. To accomplish that task, Verizon MA will, among other things, need to convene a diverse group of personnel to prepare cost information for Massachusetts-specific rates. The additional time

requested in this Motion will ensure that the responsible personnel can perform the required work completely and accurately.

In this Motion, Verizon MA also seeks the same two-week extension of the Department's schedule for discovery, intervenor testimony, hearings, and briefing of routine modification related issues, as shown on Exhibit I. This modest extension will have minimal impact on the overall procedural schedule, and no party will be prejudiced by the short delay. Accordingly, good cause exists for the Department to grant this Motion.

WHEREFORE, for the foregoing reasons, the Department should grant this Motion to amend the procedural schedule and extend the deadline for submission of Verizon MA's testimony - and for all other rate matters identified on Exhibit I - by two weeks.

Respectfully submitted,

VERIZON MASSACHUSETTS

By its attorneys,

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